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*Attorneys for Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☒ Affects Pacific Gas and Electric  
Company  
☐ Affects both Debtors

*\* All papers shall be filed in the Lead  
Case, No. 19-30088 (DM).*

Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case) (Jointly Administered)

**DECLARATION OF THEODORE E. TSEKERIDES  
IN SUPPORT OF DEBTORS' MOTION PURSUANT  
TO FED. R. BANKR. P. 4001(d) TO APPROVE  
STIPULATION BETWEEN DEBTOR PACIFIC GAS  
AND ELECTRIC COMPANY AND RICHARD  
TROCHE, ROBERT RIGLEY, STEVE FREDIANI,  
AND MICHAEL DION FOR LIMITED RELIEF  
FROM THE AUTOMATIC STAY**

**Objection Deadline:** April 30, 2020  
4:00 p.m. (Pacific Time)

**No hearing requested absent timely objection. If timely  
objection is filed, hearing reserved for:**

Date: May 27, 2020  
Time: 10:00 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 I, Theodore Tsekerides, pursuant to section 1746 of title 28 of the United States Code, hereby  
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,  
3 information, and belief:

4 1. I am a Partner at Weil, Gotshal & Manges LLP, counsel to PG&E Corporation  
5 (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”, and together with PG&E  
6 Corp., the “**Debtors**”). I submit this declaration in support of *Debtors’ Motion Pursuant to Fed. R.*  
7 *Bankr. P. 4001(d) to Approve Stipulation between Pacific Gas and Electric Company and Richard*  
8 *Troche, Robert Rigley, Steve Frediani, and Michael Dion for Limited Relief from the Automatic Stay*  
9 (the “**Motion**”). I am authorized to submit this declaration on behalf of the Debtors.

10 2. The matters stated herein are based upon my personal knowledge and review of  
11 relevant documents. If called upon, I would testify to the facts set forth in this declaration.

12 3. Richard Troche, Robert Rigley, Steve Frediani, and Michael Dion (collectively, the  
13 “**Prospective Plaintiffs**”) each seek to commence individual lawsuits (collectively, the “**Prospective**  
14 **Lawsuits**”, and each individually, a “**Prospective Lawsuit**”) in the Superior Courts of the State of  
15 California (the “**State Courts**”) in order to pursue their respective claims against the Utility  
16 allegedly arising out of the Utility’s termination of their employment. The Prospective Plaintiffs are  
17 each separately also currently engaged in grieving their dismissals under contractually-mandated  
18 dispute resolution procedures provided for in the current collective bargaining agreement (“**CBA**”)   
19 between the Utility and the International Brotherhood of Electrical Workers, Local 1245 (the  
20 “**Union**”).

21 4. The Prospective Plaintiffs have requested that the Utility agree to modify the  
22 automatic stay in order to allow them to commence their individual Prospective Lawsuits, and have  
23 stated their intent to move before the Court for relief from the automatic stay if an agreement with  
24 the Debtors cannot be reached. The Debtors believe it is in the best interest of their estates to avoid  
25 the burden and cost that would be associated with opposing such motions for relief from the  
26 automatic stay.

27 5. The Stipulation provides material benefits to the Debtors and their estates, has been  
28 authorized by the Debtors in the exercise of their business judgment, and is in the best interest of the

1 Debtors, their estates, and their creditors.

2 Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that the foregoing is true  
3 and correct.

4  
5 Dated: April 9, 2020

6  
7 /s/ Theodore E. Tsekerides  
8 Theodore E. Tsekerides